

IN THE
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

BRYAN TRAVIS ROBISON,

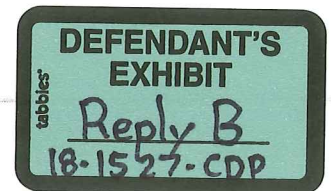
Petitioner,

vs.

DEPARTMENT OF INSURANCE,
FINANCIAL INSTITUTIONS AND
PROFESSIONAL REGISTRATION,
ET AL.,

Respondent.

Case No. 4:18-CV-01527-CDP



State of Missouri

) ss

County of Cole

AFFIDAVIT OF SPECIAL INVESTIGATOR KEVIN DAVIDSON

Before me, the undersigned authority, personally appeared Kevin Davidson who, being by me duly sworn, deposed as follows:

1. My name is Kevin Davidson, I am of sound mind, capable of making this affidavit, and personally acquainted with the facts herein stated.

2. I am a Special Investigator with the Consumer Affairs Division in the Missouri Department of Commerce and Insurance ("Department"), formerly known as the Missouri Department of Insurance, Financial Institutions and Professional Registration. I have been employed as a Special Investigator with the Department since July 16, 2016. Before that, I was employed with the Department as a Consumer Complaint Specialist II and as an Investigator, with the Department of Revenue as a Tax Technician I, and with the Department of Elementary and Secondary Education as a Supervisor.

3. On July 29, 2016, the Director entered his Order Refusing to Renew General Bail Bond Agent License ("Refusal Order") as against Bryan Travis Robison.

4. Also on July 29, 2016, I sent letters to each of the twenty-three (23) bail bond agents who indicated to the Department that Bryan Travis Robison was their general bail bond agent under whose authority they were writing bonds. Def. Reply Exhibit C. These letters explained that since the Director did not renew Robison's general bail bond agent license, these bail bond agents could no longer write under the authority of Bryan Travis Robison, because Bryan Travis Robison no longer had that authority.

5. I did not send any such letters to any sheriff's departments or circuit courts, in Missouri or anywhere else, regarding the Refusal Order.

6. I sent one of these letters to Stephen Robison, Sr., because Stephen Robison, Sr. was licensed as a bail bond agent at the time of the Refusal Order (July 29, 2016) and was at that time writing under Bryan Travis Robison's authority. Stephen Robison, Sr. was first licensed as a bail bond agent on August 31, 2012. That license expired on September 1, 2016 due to non-renewal. Stephen Robison, Sr. again received a bail bond agent license on October 27, 2017 and renewed it on October 24, 2019. That license expires on October 27, 2021.

7. Bail bond forfeiture judgments are disqualifying under Missouri Supreme Court Rule 33.17. The Department looks at an individual's qualifications in determining whether a license may permissibly be renewed. When Robison self-reported unsatisfied judgments to the Department, he admitted that he was not qualified to hold a general bail bond agent license.

8. Collection of bail bond forfeiture judgments by courts is distinct from whether such judgments are disqualifying for purposes of licensure. *See State v. Michael R. Thomas Bail Bond Company*, 367 S.W.3d 632 (Mo. App. W.D. 2012). The Department does not control when or how courts report bond forfeiture judgments to the Department.

9. When a general bail bond agent is no longer licensed, the Department waits six months or more before using the assets of the general bail bond agent previously assigned to the Department under § 374.715.2 and § 374.763.1 to pay any unsatisfied judgments. This gives courts time to report those judgments so that they may collect on them.

10. The Department has not yet accessed or used the assets that Bryan Travis Robison assigned to the Department when he became a general bail bond agent in order to satisfy his unsatisfied bond forfeiture judgments.

11. I am not aware of any statute, regulation, rule or Missouri case that characterizes bond forfeiture judgments as "unripe" in the manner in which Bryan Travis Robison characterizes them.

12. Further affiant sayeth naught.



Kevin Davidson
Special Investigator
Consumer Affairs Division
Missouri Department of Commerce and
Insurance

In witness whereof I have hereunto subscribed my name and affixed my official seal this 19th day of November, 2019.



Notary

My commission expires: September 12, 2021



JODI L. LEHMAN
My Commission Expires
September 12, 2021
Cole County
Commission #13487804